

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

MARC VEASEY, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 2:13-cv-193 (NGR)
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
	§	
Defendants.	§	

**JOINT MOTION TO SET BRIEFING SCHEDULE REGARDING APPELLATE  
ATTORNEYS' FEES**

On September 3, 2021, the Fifth Circuit affirmed this Court's order granting Private Plaintiffs' motion for attorneys' fees. On September 20, 2021, the Fifth Circuit entered an order remanding the issue of Private Plaintiffs' appellate attorneys' fees for determination by this Court. The parties have begun discussions to determine whether the issue of appellate attorneys' fees can be resolved without the need for further Court action. To enable the parties to continue those discussions, the parties respectfully request that the Court enter the following briefing schedule related to Plaintiffs' request for appellate attorneys' fees:

**Private Plaintiffs provide native timesheets and costs to State Defendants for review: Due November 1, 2021**

**Private Plaintiffs' Motion for Appellate Attorneys' Fees: Due November 19, 2021**

**State Defendants' Response: Due December 17, 2021**

**Private Plaintiffs' Reply: Due January 7, 2022**

September 29, 2021

Respectfully submitted,

By: /s/ Danielle M. Lang  
J. GERALD HEBERT  
DANIELLE M. LANG  
Campaign Legal Center  
1101 14th St. NW, Suite 400  
Washington, DC 20005

CHAD W. DUNN  
K. SCOTT BRAZIL  
BRAZIL & DUNN  
4407 Bee Caves Road  
Building 1, Suite 111  
Austin, TX 78746

ARMAND G. DERFNER  
Derfner & Altman  
575 King Street, Suite B  
Charleston, S.C. 29403

NEIL G. BARON  
Law Office of Neil G. Baron  
914 FM 517 W, Suite 242  
Dickinson, Texas 77539

DAVID RICHARDS  
Richards, Rodriguez & Skeith, LLP  
816 Congress Avenue, Suite 1200  
Austin, Texas 78701

*Counsel for Veasey/LULAC Plaintiffs*

/s/ Lindsey B. Cohan  
JON M. GREENBAUM  
EZRA D. ROSENBERG  
BRENDAN B. DOWNES  
Lawyers' Committee for  
Civil Rights Under Law  
1401 New York Avenue NW Suite 400  
Washington, D.C. 20005  
WENDY WEISER  
MYRNA PÉREZ  
The Brennan Center for Justice at NYU Law School

120 Broadway, Suite 1750  
New York, New York 10271

SIDNEY S. ROSDEITCHER  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, New York 10019-6064

LINDSEY B. COHAN  
Dechert LLP  
500 W. 6th Street, Suite 2010  
Austin, Texas 78701

NEIL STEINER  
DECHERT LLP  
1095 Avenue of the Americas  
New York, New York 10036-6797

JOSE GARZA  
Law Office of Jose Garza  
7414 Robin Rest Drive  
San Antonio, Texas 98209

DANIEL GAVIN COVICH  
Covich Law Firm LLC  
802 N Carancahua, Ste 2100  
Corpus Christi, Texas 78401

GARY BLEDSOE  
Potter Bledsoe, LLP  
316 W. 12th Street, Suite 307  
Austin, Texas 78701

VICTOR GOODE  
NAACP  
4805 Mt. Hope Drive  
Baltimore, Maryland 21215

ROBERT NOTZON  
The Law Office of Robert Notzon  
1502 West Avenue  
Austin, Texas 78701

*Counsel for the Texas State Conference of NAACP  
Branches and the Mexican American Legislative  
Caucus of the Texas House of Representatives*

/s/ Leah Aden  
SHERRILYN IFILL  
JANAI NELSON  
LEAH C. ADEN  
DEUEL ROSS  
NAACP Legal Defense and Educational Fund, Inc.  
40 Rector Street, 5th Floor  
New York, NY 10006

JONATHAN PAIKIN  
KELLY P. DUNBAR  
TANIA FARANSSO  
Wilmer Cutler Pickering Hale and Dorr LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006

*Counsel for Imani Clark*

LUIS ROBERTO VERA, JR.  
Law Office of Luis Roberto Vera Jr.  
111 Soledad, Ste 1325  
San Antonio, TX 78205

*Counsel for LULAC*

/s/ Rolando L. Rios  
ROLANDO L. RIOS  
115 E. Travis, Suite 1645  
San Antonio, Texas 78205

*Counsel for the Texas Association of Hispanic  
County Judges and County Commissioners*

/s/ Robert W. Doggett  
ROBERT W. DOGGETT  
SHOSHANA J. KRIEGER  
Texas RioGrande Legal Aid  
4920 N. IH-35  
Austin, Texas 78751

JOSE GARZA  
Texas RioGrande Legal Aid  
1111 N. Main Ave.  
San Antonio, Texas 78212

*Counsel for Lenard Taylor, Eulalio Mendez Jr.,  
Lionel Estrada, Estela Garcia Espinoza, Margarito  
Martinez Lara, Maximina Martinez Lara, and La  
Union Del Pueblo Entero, Inc.*

AND

By:

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Deputy Attorney General for Civil  
Litigation

THOMAS A. ALBRIGHT  
Chief for General Litigation Division

/s/ Summer R. Lee

**SUMMER R. LEE**

Attorney-in-Charge  
Texas Bar No. 24046283  
Assistant Attorney General  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
(512) 463-2120  
FAX: (512) 320-0667  
[summer.lee@oag.texas.gov](mailto:summer.lee@oag.texas.gov)

**COUNSEL FOR STATE DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2021, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ J. Gerald Hebert  
Counsel for Plaintiffs